

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
<http://www.cdphe.state.co.us/hm/>

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-3300
Fax (303) 759-5355

222 S. 6th Street, Room 232
Grand Junction, Colorado 81501-2768
Phone (970) 248-7164
Fax (970) 248-7198

January 23, 2001



Colorado Department
of Public Health
and Environment

Cliff Franklin
DOE – RFFO
10808 Highway 93, Unit A
Golden, CO 80403-8200

Draft Rock Creek Reserve Integrated Natural Resources Management Plan and Environmental Assessment December 2000

Dear Mr. Franklin:

The Colorado Department of Public Health and Environment (CDPHE) appreciates the opportunity to comment on the captioned document. We strongly endorse the need for integrated planning and management of the natural resources in the vicinity of Rocky Flats. There is a pressing need to identify management agencies capable of long-term stewardship of these resources and integrate them into site activities before closure of Rocky Flats. This report is a start in that direction, but its deficiencies lie in what is not included rather than what is stated.

The report does not appear to benefit from the experience of on-site personnel who currently perform buffer zone management work, prepare the survey reports (vegetation, wildlife, etc.) and interface with the other activities underway at the Site. Integration of these activities into Site operations is necessary to assure that closure actions are consistent with and supporting of natural resource management needs. Examples of activities that are of importance to closure and Buffer Zone management include:

- Weed control practices, including prescribed burns
- Land re-configuration
- Water balance studies
- Actinide migration studies
- Erosion controls and re-vegetation
- Environmental monitoring (the Integrated Monitoring Plan and special project monitoring), and
- The Comprehensive Risk Assessment for the Buffer Zone and Industrial Area.

The understanding of one area in particular is critical to the caretaker role of the reserve: its hydrology, specifically the water balance knowledge necessary to examine impacts to the ground

ADMIN RECORD

BZ-A-000421

water, seep and stream flow in the Reserve. Much is made of the role of imported water to Walnut Creek and Woman Creek, yet Rock Creek has little if any imported water and represents the goal of post-closure reclamation. Therefore, an understanding of the Rock Creek Reserve hydrology is critical for the water balance and land reconfiguration studies underway for the Industrial Area of Rocky Flats.

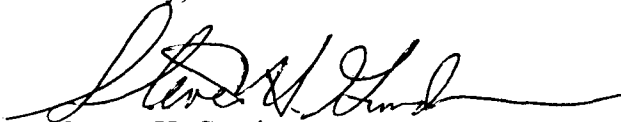
The report appears to minimize the potential impacts of current and permitted mining within and adjacent to the Reserve; in fact, mining areas are not even shown in the figures. The mining could influence the hydrology, which supports the habitats within the Reserve, and could directly remove surface features, requiring restoration to reestablish the habitat. To our knowledge, no baseline has been prepared of the Reserve showing the depth to ground water with spatial and temporal variation, the pathways for seeps and alluvial discharges, and the habitat requirements in relation to any proposed mining activities. Reclamation of the xeric prairie grasses (big blue stem) has been estimated to take a hundred years or more. Therefore, the cost of reclamation cannot be adequately assessed and incorporated in the economic analysis to determine the reclamation requirements for these lands.

The report also ignores the status of the Recovery Plan for the Preble's Meadow Jumping Mouse (PMJM) presently under development. Some major issues concerning the PMJM could materially impact management of the Reserve, the Site as a whole, and adjacent public lands. All of RFETS is potentially PMJM habitat, including what is now the Industrial Area after closure. Effective management of PMJM populations and habitat on Rocky Flats and surrounding public lands may relieve the pressures to manage equivalent habitat on privately owned lands.

As it stands, the report provides the minimum necessary to justify US Fish and Wildlife Service (FWS) management of the Rock Creek Reserve. What is required, however, is that both the DOE and FWS take seriously the need to integrate their activities in order to develop the additional knowledge and data necessary for both management of the Site's resources and for successful closure of the Site. These future activities need to occur within public view and with the involvement of all affected parties. We expect to monitor this progress and participate in assuring that the necessary integration takes place.

If you have any questions, please contact either Steve Tarlton at 303-692-3423 or Jeb Love at 303-692-3422.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Jane Norton, CDPHE
Douglas H. Benevento, CDPHE
John Swartout, Office of the Governor
Tim Rehder, EPA
Administrative Records, Building 850

